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 12 Attorneys for DePuy Orthopaedics, Inc.
 13 DePuy, Inc., DePuy International Limited,
 14 Johnson & Johnson Medical Ltd., Johnson &
 15 Johnson Management Limited, Johnson &
 16 Johnson International, Johnson & Johnson,
 17 and Precision Instruments, Inc.

18 UNITED STATES DISTRICT COURT
 19 DISTRICT OF NEVADA

20 ROSE MONTEIRO; and
 21 PRISCILLA GORDON,

22 Plaintiffs,

23 v.

24 DEPUY ORTHOPAEDICS, INC.;
 25 DEPUY, INC.; DEPUY
 26 INTERNATIONAL LIMITED;
 27 JOHNSON & JOHNSON
 28 MEDICAL LTD.; JOHNSON &
 29 JOHNSON MANAGEMENT
 30 LIMITED; JOHNSON &
 31 JOHNSON INTERNATIONAL,
 32 and JOHNSON & JOHNSON;
 33 PRECISION INSTRUMENTS,
 34 INC.,

35 Defendants.

36) Case No. 2:12-cv-01576-MMD-CWH
 37)
 38)
 39) STIPULATION AND PROPOSED
 40) ORDER TO STAY DISCOVERY
 41) AND FOR CONTINUANCE TO
 42) FILE JOINT DISCOVERY PLAN
 43) AND SCHEDULING ORDER
 44)
 45) (FIRST REQUEST)

46
 47 The parties stipulate and request that the Court enter an order
 48 continuing the deadline for filing a joint discovery plan and scheduling

1 order pending resolution of either: (1) defendants' Motion to Stay Pending
2 Transfer to MDL No. 2197 – *In re: DePuy Orthopaedics, Inc. ASR Hip Implant*
3 *Products Liability Litigation*, (#2); or (2) plaintiffs' Motion to Remand (#6).

4 This is the first continuance sought in connection with this
5 deadline. The parties request it because the Court's disposition of either
6 one of these two pending motions may obviate the need for any discovery
7 or other proceedings in this Court. If the Court grants defendants' motion
8 to stay all proceedings pending MDL transfer, no discovery will be had in
9 this Court. If the Court grants plaintiffs' motion to remand, the Court will
10 no longer have jurisdiction and no discovery or other action will be taken
11 in this Court.

12 The parties thus submit that good cause exists for continuing
13 the deadlines imposed by Fed. R. Civ. P. 26(f) and respectfully request that
14 the Court enter an order continuing the deadline for filing a joint discovery
15 plan and scheduling order until it issues a decision on defendants' motion
16 to stay or plaintiffs' motion to remand. If the Court denies both motions,
17 the parties request that the deadline for filing a stipulated discovery plan

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1 and scheduling order be set for 15 days after entry of the order(s) denying
2 the motions.

3 WHITE & WETHERALL, LLP

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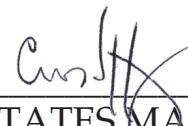
10 Attorneys for Plaintiffs

11 Attorneys for Defendants

12 DePuy Orthopaedics, Inc.
13 DePuy, Inc., DePuy International
14 Limited, Johnson & Johnson Medical
15 Ltd., Johnson & Johnson
16 Management Limited, Johnson &
17 Johnson International, Johnson &
18 Johnson, and Precision Instruments,
19 Inc.

20 ORDER

21 IT IS SO ORDERED. The deadline for submitting the joint
22 discovery plan and scheduling order is continued until decision on
23 defendants' motion to stay (#2) and/or plaintiffs' motion to remand (#6). If
24 both motions are denied, the parties shall submit a stipulated discovery
25 plan and scheduling order within 15 days after entry of the order denying
26 the motions.



27
28 UNITED STATES MAGISTRATE JUDGE

DATED: October 15, 2012